



ITEM 7
SUP. Doc. 8

CITY OF OCEANSIDE

OFFICE OF CITY MANAGER

October 16, 2003

Victor Vasquez
California Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-6972

RE: POTW:01-0146.02:VASQV - ADDENDUM NO. 1 TO ORDER NO. 2000-11

Dear Victor,

Please accept the following comments on the proposal to change the surf zone monitoring program sampling frequency and procedures.

1. The City of Oceanside does not object to the increase in monitoring. We have always felt that public safety is the most important priority. The City voluntarily added five additional shoreline sampling locations so that the entire coastline within Oceanside is monitored. We have sampled these voluntary locations for over twenty years.
2. As long as you are incorporating the standard operating procedures for collecting the samples from the San Diego County Department of Environmental Health, you should also adopt the recommended methods for the analysis of recreational marine water for AB 411. See the following website for a copy:
http://www.dhs.cahwnet.gov/ps/ddwem/beaches/ab411_methods.htm

The methods are recommended by the Environmental Laboratory Accreditation Program (ELAP) and the Microbiological Disease Laboratory (MDL) for the analysis of recreational marine water for compliance with Health and Safety Code §115880 [Assembly Bill 411 (AB 411), Statutes of 1997, Chapter 765].

The only change that adopting the methods recommended by the County would be to add the IDEXX Company method for enterococcus called Enterolert. The City currently tests the five required shore stations identified as S-1 through S-5 in our NPDES permit using the Standard Method 9230 C, which takes 48 hours to run. The five voluntary stations are tested using the Enterolert method, which only takes 24 hours to complete. It is desirable that with this increased monitoring, the City be allowed to use Enterolert for all samples. Both data are acceptable to the County. They prefer the Enterolert method because of the 24-hour completion.

3. Sampling weekly during the winter months is going to subject the City to monitoring for stormwater effects when our actual requirement is to see if the

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outfall is impacting the shoreline. Sampling during or after rain events will be necessary in order to meet the weekly sampling requirement. Under the AB411 requirements, any samples that exceed the AB411 limits must be posted and resampled in order to remove the signs. The original sample and the resample data will be entered into our NPDES monitoring reports. There is a concern that this will lead to issuance of violations to the City when storm water runoff is the cause of the elevated bacterial counts.

The County does not currently take shoreline samples during the winter. During a storm event they issue a 72-hour advisory. The only areas that could possibly be posted are sample locations taken by sewer agencies or areas contaminated by a sewer spill. Posting during an advisory will lead to confusion by the public. Is this posted area worse than the other areas under an advisory? If the monitoring program is to truly determine if the sewage plume is returning to the shoreline, then sampling during or after rain events should not be used in compliance determinations or the sampling should be suspended.

If you have any questions or need additional information contact me at 760-435-5804.

Sincerely,

A handwritten signature in black ink, appearing to read "Guss Pennell", written in a cursive style.

Guss Pennell
Environmental Regulatory Compliance Officer

CC: Clay Clifton, SD County DEH